

Exhibit 1

From: [Knapp, Timothy](#)
To: [Tom Egler](#); [Welch, Donna M.](#); [Levy, Jennifer](#)
Cc: [Matthew Melamed](#); [lsinger@motleyrice.com](#); [mcrawford@skikos.com](#); [Aelish Baig](#); [Dory Antullis](#); [Carissa Dolan](#); [Henry Rosen](#)
Subject: RE: Allergan waivers of service
Date: Friday, November 30, 2018 4:55:00 AM

Tom,

Judge Polster's Order referenced in Aelish's email discusses accepting service on foreign named defendants. Below we confirmed Allergan plc's willingness to accept service over its objections and subject to a reservation of rights.

As for the "US subsidiaries" referenced in your email below, that issue was not addressed in the Order Aelish referenced. And, as I noted, the only Allergan US entity that is a party to the Track 1 lawsuits is Allergan Finance, LLC. There are no other "US subsidiaries" included in the captions or identified in the complaints. So there is nothing for any other entity to accept service of.

Finally, with respect to your continued suggestion that Allergan is withholding data that might be in the possession of its subsidiaries, we disagree. I know you and Donna have corresponded on that issue extensively, including in a chart Donna sent earlier today. That chart again confirms that Allergan Finance is producing "all responsive documents and information reasonably accessible to all of its current affiliates." If there are particular discovery requests you'd like to discuss, please let us know.

Thanks,
Tim

Timothy W. Knapp

KIRKLAND & ELLIS LLP
300 North LaSalle, Chicago, IL 60654
T +1 312 862 7426
F +1 312 862 2200

timothy.knapp@kirkland.com

From: Tom Egler <TomE@rgrdlaw.com>
Sent: Thursday, November 29, 2018 5:20 PM
To: Knapp, Timothy <tknapp@kirkland.com>; Welch, Donna M. <dwelch@kirkland.com>; Levy, Jennifer <jlevy@kirkland.com>
Cc: Matthew Melamed <MMelamed@rgrdlaw.com>; lsinger@motleyrice.com; mcrawford@skikos.com; Aelish Baig <AelishB@rgrdlaw.com>; Dory Antullis <DAntullis@rgrdlaw.com>; Carissa Dolan <CDolan@rgrdlaw.com>; Henry Rosen <HenryR@rgrdlaw.com>
Subject: RE: Allergan waivers of service

Tim -

Our November 19, 2018 email asked that Allergan identify "its U.S. subsidiaries that manufacture, market, sell, distribute or monitor suspicious sales of opioids in the U.S. " We have been seeking this information since August and before, with no coherent response from Allergan. Please provide that information.

Further, plaintiffs disagree with the conclusions set forth in your email below regarding acceptance of service and Judge Polster's order. As you are aware, this is part and parcel of the issues we have been discussing with your firm at least since August. The bellwether complaints make clear that Allergan's relevant subsidiaries and affiliates are parties to the case. See, e.g., Summit County Second Amended Corrected Complaint at paragraphs 71-72; 128. Further, in compliance with the various orders on motions to compel we have had to bring, Allergan finally recently affirmed that it was responding to discovery in this action on behalf of "all of its current affiliates, including Allergan plc." See e.g. Allergan's Third Amended Objections and Responses to Plaintiffs First Set of Interrogatories" at 2.

Once again, we ask that you please have your clients to accept service for all of Allergan's U.S. subsidiaries that manufacture, market, sell, distribute or monitor suspicious sales of opioids in the U.S.

Thanks

Tom Egler

From: Knapp, Timothy [<mailto:tknapp@kirkland.com>]
Sent: Monday, November 19, 2018 4:32 PM
To: Aelish Baig
Cc: Welch, Donna M.; Levy, Jennifer; Tom Egler; Matthew Melamed; lsinger@motleyrice.com; mcrawford@skikos.com
Subject: Re: Allergan waivers of service

Aelish,

Consistent with Judge Polster's November 9, 2018 Minutes and Order [Dkt 1108], Allergan plc will accept service over its objection to personal jurisdiction and subject to a reservation of rights to contest personal jurisdiction. The Minutes and Order say nothing about accepting service for "all of its U.S. subsidiaries that manufacture, market, sell, distribute or monitor suspicious sales of opioids in the U.S." As you know, Allergan Finance, LLC is a party to this litigation and already accepted service. No other Allergan entities are parties to the Track 1 cases, so it would make no sense to accept service for them. Nor does the relevant portion of the Minutes and Order say anything about discovery, which I understand has been addressed in other correspondence. If you'd like us to waive service for Allergan plc consistent with the Minutes and Order, please send an updated waiver form and we will sign and return it.

Thanks,
Tim

Timothy W. Knapp

KIRKLAND & ELLIS LLP

300 North LaSalle, Chicago, IL 60654

T +1 312 862 7426

F +1 312 862 2200

timothy.knapp@kirkland.com

On Nov 19, 2018, at 2:03 PM, Aelish Baig <AelishB@rgrdlaw.com> wrote:

Dear Counsel,

Consistent with Judge Polster's November 9, 2018 Minutes and Order requiring defendants to accept service on behalf of applicable foreign parents of defendants, please find attached a waiver of service for Allergan PLC and all of its U.S. subsidiaries that manufacture, market, sell, distribute or monitor suspicious sales of opioids in the U.S. Please confirm you are accepting service, identify all such entities by name, and confirm they are all participating in discovery as soon as possible.

Thank you,
Aelish

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